

12/060

Monday August 6, 2012

To: Inweatlth
Attn: Irene Potter
From: Mr. Bengis
Cc: SG Hambros
Re: Payment Request

If the directors of **Biema**, agree, please make the following payments as advised by the protector.

To: Max Alerta
details on file
Amount: \$3,850 (three thousand eight hundred and fifty)
Purpose: Property maintenance July

Thank You,

a.

Mr. Bengis



David Bengis
<davidbengis@mac.com>
19/11/2010 11:52

To Kathryn OSMAND/priv/gb/socgen@socgen
cc
bcc
Subject Re: FUNDS RECEIVED 0213594 Biema
Holdings Limited [NC]

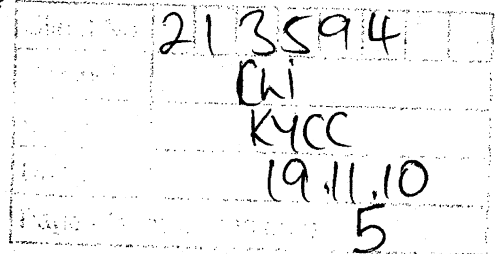
History: This message has been replied to.

That's correct - Biema holds a loan to sacs (propco). They pay interest on this loan annually.

On 19/11/10 11:42, "Kathryn OSMAND" <kathryn.osmand@sghambros.com> wrote:

> Thanks David - can you just clarify that this is the interest/profit for
> the real estate property portfolio in the US?

> Regards
>
> (Embedded
> image moved
> to file:
> pic08187.jpg)



>
> Kathryn Osmand
> Private Banking Officer
> SG Hambros Bank (Channel Islands) Limited
> 18 Esplanade, St Helier, Jersey, JE4 8PR
> Tel.: +44 1534 815 413
> Fax: +44 (0) 1534 815 640
> kathryn.osmand@sghambros.com
> www.privatebanking.societegenerale.com/hambros

>
> Best Wealth Manager for Alternative Investment - IC/FT
Wealth
> Management Awards 2009
> UK's Best Private Bank for its Offer in Structured
Products -
> Euromoney 2009, 2008, 2006
> Best for Inheritance and Succession Planning - Euromoney
2007

David Bengis
<davidbengis@mac.com>

19/11/2010 11:27

To

Kathryn

OSMAND/priv/gb/socgen@socge

> n

> cc

> Subject

> Re: FUNDS RECEIVED 0213594
Biema Holdings Limited

> [C1]

>

>

>

>

>

>

>

> Interest

>

> On 19/11/10 11:20, "Kathryn OSMAND" <kathryn.osmand@sghambros.com> wrote:

>

>>

>> Dear Karine

>>

>> With regard to the funds received yesterday, please could you let me know

>> the purpose and nature of this transaction.

>>

>> Thanking you in advance.

>>

>> Kind Regards

>>

>>

>> (Embedded
>> image moved
>> to file:
>> pic19631.jpg)

>>

>>

>> Kathryn Osmand
>> Private Banking Officer
>> SG Hambros Bank (Channel Islands) Limited
>> 18 Esplanade, St Helier, Jersey, JE4 8PR
>> Tel.: +44 1534 815 413
>> Fax: +44 (0) 1534 815 640
>> kathryn.osmand@sghambros.com
>> www.privatebanking.societegenerale.com/hambros

>>

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>> Best Wealth Manager for Alternative Investment - IC/FT

> Wealth

>>

>> Management Awards 2009
>> UK's Best Private Bank for its Offer in Structured

> Products -

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>> Euromoney 2009, 2008, 2006

>> Best for Inheritance and Succession Planning - Euromoney

> 2007

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>> |-----

>> Kathryn
>> OSMAND/priv/gb/so
>> cgen
>> 18/11/2010 10:20
>>
>>
>>
> To
>>
> Karine.Lebocey@inwealthtrus
>> t.com
>>
> cc
>> davidbengis@mac.com
>>
> Subject
>> Fw: FUNDS RECEIVED
0213594
>> Biema Holdings Limited
> [C1]
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>>
>>
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>>
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>>
>>
>> Dear Karine
>>
>> Please find attached confirmation of funds received into the account of
>> Biema Holdings Ltd.
>>
>> Kind Regards
>>
>> (Embedded
>> image moved
>> to file:
>> pic29744.jpg)
>>
>>
>> Kathryn Osmand
>> Private Banking Officer
>> SG Hambros Bank (Channel Islands) Limited
>> 18 Esplanade, St Helier, Jersey, JE4 8PR
>> Tel.: +44 1534 815 413
>> Fax: +44 (0) 1534 815 640
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SYNERGY INDEX					
Cabinet:	Money Laundering	Document Type:	KYC	Client No:	213594
Free Text:	Account Opening Checklist			Pages Scanned:	4
				Doc Date:	1/6/10

This Document is in two parts - 1) Establishing the identity of the client; and 2) KYCB Profile. Both parts need to be completed before sign off. Refer to Guidance notes on Page 4 before completing this document.

PART 1. ESTABLISHING THE IDENTITY OF YOUR CLIENT (IDV).

Full Company Name:	Biema Holding Ltd	Root No:	213594
CARE: Original or certified copies should be obtained of the following documents or the local jurisdiction's equivalents.			

For ALL Companies: Obtain <u>ALL</u> of the following documents:		Tick relevant document	Date Copy placed on file
	Resolution of the Board of Directors to open an account and confer authority on those who will operate it, together with the current list of signatories;	<input type="checkbox"/>	_____
AND	Proof of Listing (If applicable) from a Recognised, Designated or Approved Investment Exchange ^o (via website or Periodical) in the UK or a country with equivalent anti money laundering legislation ;	<input type="checkbox"/>	_____
AND	Certificate of Incorporation or Certificate to Trade;	<input type="checkbox"/>	_____
AND	Full Company Search of the Registrar of Companies or local equivalent (also ensures company still exists); or Enquiry via a business information service. * Record reason if unable to attain – see note below.	<input type="checkbox"/>	_____
AND	Latest report and accounts, audited, where applicable. * Record reason if unable to attain – see note below.	<input type="checkbox"/>	_____
AND	If a trading company; provide confirmation in a file note that you have visited the principal trading address of the company and can confirm its physical existence and trading activity.	<input type="checkbox"/>	_____

AND, IF A NON-UK Company: Obtain <u>ALL</u> of the following additional documents:			
	Memorandum & Articles of Association	<input type="checkbox"/>	_____
AND	Copy of the share certificate(s) confirming shareholder(s) name(s) and that the share(s) are not held in bearer form.	<input type="checkbox"/>	_____
AND	Declaration of Beneficial Ownership (Available on <u>SG HAMBROS ONLINE</u>);	<input type="checkbox"/>	_____
AND	If Company was incorporated more than 12 months ago, an up-to-date Certificate of Good Standing or Certificate of Incumbency.	<input type="checkbox"/>	_____

AND, For all Private Companies (i.e. not listed on a Recognised, Designated or Approved Investment Exchange^o):			
	Verify the identity of <u>every</u> Controlling Director [±] (which may include the company secretary). Use a separate Checklist E2 (F2 if Corporate) for each Director	<input type="checkbox"/>	_____
AND	Verify the Beneficial owner(s) " or Ultimate Controller(s) of the company holding >10% of the shares (if not verified above). Use a separate Checklist E2 for each Individual (F2 if Corporate).	<input type="checkbox"/>	_____
AND	If those parties are not the signatories to the account, verify the identity (person and address) of <u>every</u> person authorised to operate the account. Use a separate Checklist E2 for each Individual or F2 if Corporate signatories	<input type="checkbox"/>	_____

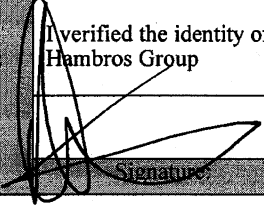
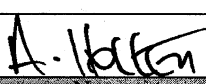



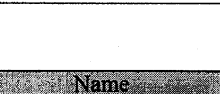
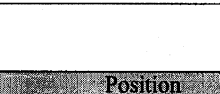
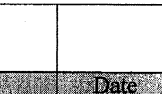
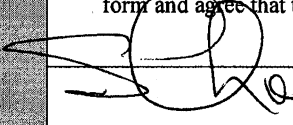
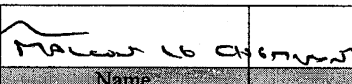
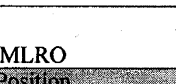

Please refer to your MLRO should you have any concerns with regards to the above documentation.

* If above documents not obtained, record reasons on a new page.

PART 2: KYCB PROFILE							
Company Name:	Biema Holdings Ltd					Root No:	213594
1. Is this Company a stand-alone entity or part of a structure?		Part of a structure	Note: If part of a structure, attach a structure diagram or a full description of entire relationship.				
2. Activities of Company (see M&A/mandate):	Real estate Business						
3. Annual Turnover:	This year	100,000	Last year				
4. Purpose of this Account	Holding company						
5. What Services are required from SG Hambros?	Bank account						
6. Source of Wealth of the beneficial owner(s).	Capital from Rosebud family trust						
7. Source of account opening funds?	USD 100,000 (Bank unknown at present)						
8. Estimated Account Activity:	Monthly						
9. Value Range of Transactions:	Incoming Funds:	USD 100,000	Payments out:	USD 100,000			
10. List any anticipated cross-border Payments / Receipts:	USA / Europe						
11. Name and address of other Company Bankers	N/A						
12. Assets:	Cash & bank accounts:		Stocks & Shares:		Properties:	USD 25M	Other:
& Liabilities:	Mortgages:		Other:		Net Worth:	USD 25M	
13. Private Companies ONLY: List ALL Directors, Shareholders, Controllers & Authorised Signatories and show % stake held.							
Full Name	Residential Address				Position Held	Stake Held (%)	
Inwealth Directors SA	See Authorised Signatory List						
Rosebud Trust	Jersey				Shareholder	100%	

List all other accounts connected to the Client(s) within the SG Hambros Group.

Name of Account	Root Number	SGH Jurisdiction	Relationship to this Company
Bengis DP	162779	Jsy	Son of UBO and ULA
Bengis GA	189421	Jsy	Daughter of UBO
Evolution	207330	Jsy	Part of Rosebud Trust

Account Approval			
Requested by (Relationship Manager):	I verified the identity of my Client for Anti-Money Laundering purposes as required by SG Hambros Group		
			
	Signature	Name	Date
Authorised by (Management):	I reviewed the verification of identity information for the prospective Client and agree that SG Hambros Group Anti-Money Laundering procedures have been complied with by the requestor in connection with this prospective Client.		
			
	Signature	Name	Date
For MLRO Compliance Purposes ONLY			
Independent review of account opening documentation by:	<ul style="list-style-type: none"> • I have checked the World-Check database and confirm that neither the company nor any of its associated individual(s) appear on any Sanction list. • I have reviewed the documentation provided to support the assertions contained on this form and agree that the documentation does, in fact, support those assertions. 		
			
	Signature	Name	Date

KYCB REVIEWS

The due date of the next review must be updated in Olympic 'Other Numbering' for the client.

In accordance with the risk grade allocated to clients, client KYCB records MUST be reviewed formally and updated.

The risk-based approach means that accounts may not be subject to formal review on an annual basis but unless KYCB records are properly updated as part of the daily/ongoing business, CRMs are required to conduct a formal review as follows:

- High risk – 6 monthly
- Medium risk – annually
- Low risk – every two years.

Refer to AML Guidance Notes for definitions of Low, Medium and High Risk.

NEXT REVIEW DATE

Client Risk Category – (Delete the Client Risk Category and 'AN' Code that are not applicable)	'AN' Code	Next Review Date (DD/MM/YY)	Client 'Root' Numbers to be changed to this date
'Low Risk' Client	125	09/06/09	213594
'Medium' Risk Client	126		
'High Risk' Client – see guidelines above	127		

KYC

24/11/08 - Biema forms part of the Bengis connection. I am in regular contact with David Bengis and the Trustees, First Advisory. Biema is the real estate company covering the Rosebud's property portfolio in USA

June 09 – In regular contact with David Bengis and First Advisory in Liechtenstein. Funds due in shortly of \$200,000.00 from Mishcon De Reya.

January 10 – Still in regular contact with David Bengis and Olivia at First Advisory in Liechtenstein. Regular payments made with regard to House Services and Property Maintenance. Account runs in line with expected activity.

PRIVATE BANKING BUSINESS KYCB RISK ASSESSMENT - COMPANIES	SYNERGY INDEX	Cabinet: Client Doc Type: KYCC
	Bank Client No.	213594 LPD5
	Doc Date	30 March 2010

Full name of Company	BIEMA HOLDINGS LTD	CLIENT No. 213594
Full Name(s) of Beneficial Owner(s)	MR ARNOLD BENGIS	

Is this the first Risk Assessment carried out on this Client? **NO**

Question	Answer	Risk
Is the Beneficial Owner's identity <u>UNKNOWN</u> to SGH?	NO	Client is High Risk
Is the Beneficial Owner or any other directly-related party, a Politically Exposed Person (PEP) or associated Person? CARE: see notes below	NO	
Is the Client Company Hold Mail?	NO	
Has the Company (or any other company within the group structure, if applicable) issued Bearer shares?	NO	
EITHER: Is the Company incorporated in (Olympic CL screen - Nationality) or have business interests, in a High Risk Country; OR is the Beneficial Owner a resident of (CL screen - Legal Domicile) or have business interests in, a High Risk Country?	NO	
Is either the Company or Beneficial Owner's wealth derived from any of: Arms trading, casino/gambling, Art/antique dealings, Precious metal dealings, Construction/public works, Import/Export business, cash transmission business?	NO	
Is there any other reason why you would consider this Company as High Risk?	YES	

Question	Answer	Rating	Weight	Score	Risk
What is the Beneficial Owner's Nationality? (Olympic CL screen - Risk Domicile)	SOUTH AFRICA	3	2	6	HIGH
In which country does the Beneficial Owner live? (CL screen - Legal Domicile)	UNITED STATES	1	2	2	LOW
From which country has the Company and Beneficial Owner's wealth been derived?	SOUTH AFRICA	3	2	6	HIGH
From what activity has the Company and Beneficial Owner accumulated their wealth?	Inheritance	1	1	1	LOW
What is the Country of Incorporation of the Company? (CL screen - Nationality)	CYPRUS	1	2	2	LOW
What is (or will be) the asset value of the Company?	£500k to £5M	2	1	2	MEDIUM

Risk Level excluding Automatic High Risk Questions

MEDIUM Risk

Client Risk	Client is HIGH Risk	Next update must be carried out by *	26 September 2010
Olympic input	Input AN code 127	Next Assessment Date :	
<p>* Unless any one of the following events occur first, in which case the Risk Assessment must be updated immediately:</p> <p>There is a change our relationship with the Company – for example: value of AUM resulting from new assets settled/purchased or assets sold/distributed; a change in investment policy; a change in banking relationship (opening a new 'root'; the possibility of litigation or similar; potential financial/reputation risk to SGH, etc.</p> <p>There is a change in the structure of the Company. This may include the addition/removal of a Shareholder; an External Director, etc.</p> <p>There is a change the circumstances of any party directly related to the Company (Beneficial Owner; Shareholder; External Director etc) - the change being something that would have a material impact on the KYCB Risk Assessment, for example a change in residence/domicile, business interests, becoming/ceasing to be deemed as a PEP, etc.</p>			

CERTIFICATION BY THE PERSON COMPLETING THIS RISK ASSESSMENT		
I confirm that this Risk Assessment is based on information provided by or on behalf of the Client and I have no reason to doubt its accuracy.		
Signature of person completing this Assessment	Kathryn Osmand - Private Banking Officer	30.03.10
	Name and Job Title	Date

CRM CONFIRMATION - Required where Assessment has not been completed by the CRM who has prime responsibility for this client		
CRM signature	Anthony Holley - Senior Private Banker	30.03.10
	Print name	Date

ADDITIONAL SIGN-OFF REQUIREMENTS		
ALL High Risk business must be signed off by a DIRECTOR of SGH (refer to local policy as regards who can sign as a 'Director') AND logged by local MLRO		
ALL new business considered as High Risk MUST be taken to the New Account Opening Committee for acceptance.		
Refer to SGHambros online\Anti-Money Laundering\Policies & Procedures\Group\2.Guidance Notes Document Set\GN7		
Director signature	Print name	Date
	ADRIAN ROWLAND	22.02.10
MLRO confirmation - High Risk business logged		31/3/10
Olympic Agreement 010 input	MLRO signature and name	Date
		31/3/10

This document establishes the Identity of a Company that is party to another Corporate, Trust or other type of account for which a separate full checklist is being completed. This document should accompany the full checklist for sign-off.

State the name and account number of the Account that this Checklist supports (i.e. Company, Trust etc)

Name : BIEMA HOLDINGS LTD

Root No: 213594

State the name of the Company that this Checklist relates to and capacity in which it is acting for the above Account

Name: INTRUST WEALTH SARL

Capacity: Corporate Secretary, Trustee etc. CORPORATE DIRECTORS

Original or certified copies should be obtained of the following documents.

Regulated or Publicly Quoted Companies: Obtain BOTH of the following:

Proof of Listing (If applicable) from a Recognised, Designated or Approved Investment Exchange^o (via website or Periodical) in the UK or a country with equivalent anti money laundering legislation ;

Tick relevant document

Date Copy placed on file

☐

AND Current list of signatories

☒

31.03.10

For ALL other Companies: Obtain ALL of the following:

Certificate of Incorporation or Certificate to Trade;

☐

AND Full Company Search of the Registrar of Companies or local equivalent (also ensures company still exists); or Enquiry via a business information service.

☐

* Record reason if unable to attain – see note below.

AND Latest report and accounts, audited, where applicable.

☐

* Record reason if unable to attain – see note below.

AND If a trading company; provide confirmation in a file note that you have visited the principal trading address of the company and can confirm its physical existence and trading activity.

☐

AND IF A NON-UK Company: Obtain the following additional documents:

Memorandum & Articles of Association

☐

AND Copy of the share certificate(s) confirming shareholder(s) name(s) and that the share(s) are not held in bearer form.

☐

AND Declaration of Beneficial Ownership (Available on [SG HAMBROS ONLINE](#));

☐

AND If Company was incorporated more than 12 months ago, an up-to-date Certificate of Good Standing or Certificate of Incumbency.

☐

For all Private Companies (i.e. not listed on a Recognised, Designated or Approved Investment Exchange^o; Obtain:

Verify the identity of **every** Controlling Director (which may include the company secretary). Use a separate Checklist E2 (F2 if Corporate) for each Director

☐

AND Verify the Beneficial owner(s) or Ultimate Controller(s) of the company holding >10% of the shares (if not verified above). Use a separate Checklist E2 for each Individual (F2 if Corporate).

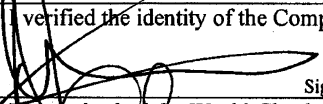
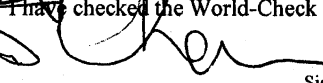
☐

AND If those parties are not the signatories to the account, verify the identity (person and address) of **every** person authorised to operate the account. Use a separate Checklist E2 for each Individual or F2 if Corporate signatories

☐

Please refer to your MLRO should you have any concerns with regards to the above documentation.

* If above documents not obtained, record reasons on a new page

Relationship Manager:	I verified the identity of the Company for Anti-Money Laundering purposes as required by SG Hambros Group			
MLRO Compliance:	I have checked the World-Check database and confirm that this Company does not appear on any Sanction list			
	Signature: 	Name: A. Holten	Position: SIB	Date: 21/3/10
	Signature: 	Name: Malcom W. Charnock	Position: 71/2/10	Date: 31/3/10

213594 CLI KYCC 30/4/08

PAGES: 4

SYNERGY INDEX			
Cabinet:	Money Laundering	Document Type:	KYC
Free Text:	Account Opening Checklist	Client No:	
		Pages Scanned:	
		Doc Date:	

This Document is in two parts – 1) Establishing the identity of the client; and 2) KYCB Profile. Both parts need to be completed before sign off. Refer to Guidance notes on Page 4 before completing this document.

PART 1. ESTABLISHING THE IDENTITY OF YOUR CLIENT (IDV).

Full Company Name:	Biema Holding Ltd	Root No:	
--------------------	-------------------	----------	--

CARE: Original or certified copies should be obtained of the following documents or the local jurisdiction's equivalents.

	Tick relevant document	Date Copy placed on file
For ALL Companies: Obtain <u>ALL</u> of the following documents:		
Resolution of the Board of Directors to open an account and confer authority on those who will operate it, together with the current list of signatories;	<input checked="" type="checkbox"/>	
AND Proof of Listing (If applicable) from a Recognised, Designated or Approved Investment Exchange ^o (via website or Periodical) in the UK or a country with equivalent anti money laundering legislation ;	<input type="checkbox"/>	
AND Certificate of Incorporation or Certificate to Trade;	<input checked="" type="checkbox"/>	
AND Full Company Search of the Registrar of Companies or local equivalent (also ensures company still exists); or Enquiry via a business information service. * Record reason if unable to attain – see note below.	<input type="checkbox"/>	
AND Latest report and accounts, audited, where applicable. * Record reason if unable to attain – see note below.	<input type="checkbox"/>	N/A
AND If a trading company; provide confirmation in a file note that you have visited the principal trading address of the company and can confirm its physical existence and trading activity.	<input type="checkbox"/>	

AND, IF A NON-UK Company: Obtain <u>ALL</u> of the following additional documents:		
Memorandum & Articles of Association	<input checked="" type="checkbox"/>	
AND Copy of the share certificate(s) confirming shareholder(s) name(s) and that the share(s) are not held in bearer form.	<input type="checkbox"/>	
AND Declaration of Beneficial Ownership (Available on <u>SG HAMBROS ONLINE</u>);	<input type="checkbox"/>	N/A
AND If Company was incorporated more than 12 months ago, an up-to-date Certificate of Good Standing or Certificate of Incumbency.	<input checked="" type="checkbox"/>	

AND, For all Private Companies (i.e. not listed on a Recognised, Designated or Approved Investment Exchange^o):		
Verify the identity of <u>every</u> Controlling Director± (which may include the company secretary). Use a separate Checklist E2 (F2 if Corporate) for each Director	<input checked="" type="checkbox"/>	
AND Verify the Beneficial owner(s) " or Ultimate Controller(s) of the company holding >10% of the shares (if not verified above). Use a separate Checklist E2 for each Individual (F2 if Corporate).	<input checked="" type="checkbox"/>	
AND If those parties are not the signatories to the account, verify the identity (person and address) of <u>every</u> person authorised to operate the account. Use a separate Checklist E2 for each Individual or F2 if Corporate signatories	<input checked="" type="checkbox"/>	


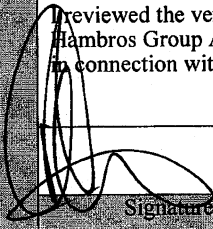

Please refer to your MLRO should you have any concerns with regards to the above documentation.

* If above documents not obtained, record reasons on a new page.

PART 2: KYCB PROFILE					
Company Name:	Biema Holdings Ltd			Root No:	
1. Is this Company a stand-alone entity or part of a structure?	Part of a structure		Note: If part of a structure, attach a structure diagram or a full description of entire relationship.		
2. Activities of Company (see M&As/mandate):	Real estate Business				
3. Annual Turnover:	This year	100,000	Last year		
4. Purpose of this Account:	Holding company				
5. What Services are required from SG Hambros?	Bank account				
6. Source of Wealth of the beneficial owner(s):	Capital from Rosebud family trust				
7. Source of account opening funds?	USD 100,000 (Bank unknown at present) refer to letter dated 19/07/07 attached.				
8. Estimated Account Activity:	Monthly				
9. Value Range of Transactions:	Incoming Funds:	USD 100,000	Payments out:	USD 100,000	
10. List any anticipated cross-border Payments / Receipts:	USA / Europe				
11. Name and address of other Company Bankers:	TBA				
12. Assets:	Cash & bank accounts:		Stocks & Shares:		Properties: USD 25M Other:
& Liabilities:	Mortgages:		Other:		Net Worth: USD 25M
13. Private Companies ONLY List ALL Directors, Shareholders, Controllers & Authorised Signatories and show % stake held:					
Full Name	Residential Address		Position Held	Stake Held (%)	
Ackermann, I	Aeuletrasse 74, 9490 Vaduz		Board Member		
Moosleithner-Batliner, A	Aeuletrasse 74, 9490 Vaduz		Board Member		
Dorbat Treuhand	Aeuletrasse 74, 9490 Vaduz		Company secretary		
Rosebud Trust	Jersey		Shareholder	100%	

List all other accounts connected to the Client(s) within the SG Hambros Group.

Name of Account	Root Number	SGH Jurisdiction	Relationship to this Company
Bengis DP	162779	Jsy	Son of UBO and ULA
Bengis GA	189421	Jsy	Daughter of UBO
Evolution	207330	Jsy	Part of Rosebud Trust
Alibaba Paul	381950 394122	Jsy	Same UBO

Account Approval				
Requested by (Relationship Manager):	I verified the identity of my Client for Anti-Money Laundering purposes as required by SG Hambros Group			
		PHIL CHAMBERS	AMB	1/08/07
	Signature	Name	Position	Date
Authorised by (Management):	I reviewed the verification of identity information for the prospective Client and agree that SG Hambros Group Anti-Money Laundering procedures have been complied with by the requestor in connection with this prospective Client.			
		A. KELLY	SLB	1/8/07
	Signature	Name	Position	Date
For MLRO Compliance Purposes ONLY				
Independent review of account opening documentation by:	<ul style="list-style-type: none"> I have checked the World-Check database and confirm that neither the company nor any of its associated individual(s) appear on any Sanction list. I have reviewed the documentation provided to support the assertions contained on this form and agree that the documentation does, in fact, support those assertions. 			
		D. MLRO	MLRO	7/8/07
	Signature	Name	Position	Date

KYCB REVIEWS

The due date of the next review must be updated in Olympic 'Other Numbering' for the client.

In accordance with the risk grade allocated to clients, client KYCB records MUST be reviewed formally and updated.

The risk-based approach means that accounts may not be subject to formal review on an annual basis but unless KYCB records are properly updated as part of the daily/ongoing business, CRMs are required to conduct a formal review as follows:

- High risk – 6 monthly
- Medium risk – annually
- Low risk – every two years.

Refer to AML Guidance Notes for definitions of Low, Medium and High Risk.

NEXT REVIEW DATE

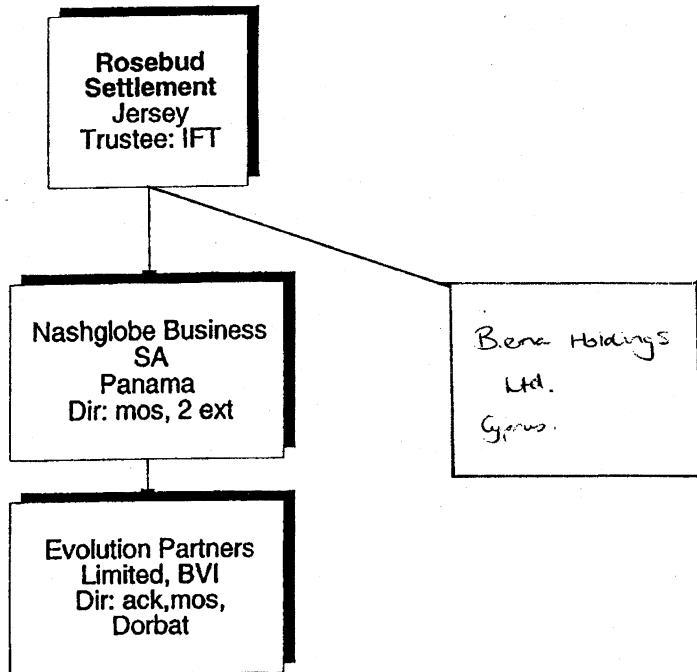
Client Risk Category – (Delete the Client Risk Category and 'AN' Code that are not applicable)	'AN' Code	Next Review Date (DD/MM/YY)	Client 'Root' Numbers to be changed to this date
'Low Risk' Client	125	01/01/07	
'Medium' Risk Client	126		
'High Risk' Client – see guidelines above	127		

Rosebud
Settlement
Jersey
Trustee: IFT

Nashglobe Business
SA
Panama
Dir: mos, 2 ext

Evolution Partners
Limited, BVI
Dir: ack, mos,
Dorbat

Bene Holdings
Ltd.
Gurus.



213594 CLI KYCC 30/4/08 PGS: 1

SG HAMBROS GROUP

CHECKLIST E2

ANTI MONEY LAUNDERING CHECKLIST – UNDERLYING INDIVIDUALS

FOR INTERNAL USE ONLY

This document establishes the Identity of an Individual who is party to a Corporate, Trust or other type of account for which a separate full checklist is being completed. This document should accompany the full checklist for sign-off.

State the name and account number of the Account that this Checklist supports (i.e. Company, Trust etc)

Account Name:	Biema Holding Ltd	Root No:	
Name of Individual to whom this Checklist relates:	Ackermann, Iwan J	Capacity in which acting: (Beneficial Owner, Settlor, Trustee, Beneficiary, ULA holder etc)	Director
Has THIS INDIVIDUAL been personally verified 'Face to Face'?			YES <input type="radio"/> NO <input checked="" type="radio"/>
'Face to Face' means any SG member of staff has personally met and verified the individual's identity.			

FACE TO FACE VERIFICATION:

Obtain one document verifying Name AND one document verifying Address.

Tick relevant document Date copy placed on file

First Verify Client's NAME with either of the following two documents:

- Current signed passport (copy pages showing front cover, document number, date and place of issue, expiry date, date and place of birth and signature); ☒
- National Identity Card (showing document number, date and place of issue, expiry date, date and place of birth and signature) ☐

Then Verify Client's Permanent Residential ADDRESS with any ONE of the following:

- Income tax notification for current year (but not if used for 2nd identity verification) ☐
- Utility bill (up to three months old) ☒
- Bank statement (up to three months old) showing permanent residential address. ☐
- Current full driving licence or photocard driving licence (temporary or provisional licences are not acceptable); but not if used for secondary identity verification ☐
- Property tax bill (for the current year) ☐
- Written Record of home visit (meeting clients inside their permanent residence) ☐
- Electoral register search through a credit reference agency ☐

IN ADDITION

IF the Client HAS NOT been personally met by any SG member of staff:

ONE of the following Documents AND ONE of the Checks must be obtained as additional identification to the above.

Tick relevant document Date copy placed on file

Documents

- Firearms certificate ☐
- Current full driving licence or photocard driving licence (temporary or provisional licences are not acceptable) ☒
- Tax Notification e.g. income tax or property tax (should show permanent residential address) ☐

Checks – attach a copy of one of the following

- The initial deposit cheque or direct debit drawn on a personal a/c in the applicant's own name at another UK or EU bank or building society. ☐
- The direct mailing of account opening documentation to a named individual at an independently verified address (e.g. 192 search). ☐
- A file note recording the telephone contact with the applicant prior to account opening on an independently verified home or business number. (e.g. 192 search) ☐
- If none of the above are available, refer to MLRO for guidance

ALSO

Relationship Manager:	I verified the identity of the above person for Anti-Money Laundering purposes as required by SG Hambros			
	<i>R. Charles</i>	Signature: <i>PHIL CHAMBERS</i>	Name: <i>AFB</i>	Position: <i>1/08/07</i> Date:
MLRO Compliance:	I have checked the World-Check database and confirm that this person does not appear on any Sanction list			
	<i>[Signature]</i>	Signature: <i>[Signature]</i>	Name: <i>DMURO</i>	Position: <i>7/8/7</i> Date:

* See a/c 207330

This document establishes the Identity of an Individual who is party to a Corporate, Trust or other type of account for which a separate full checklist is being completed. This document should accompany the full checklist for sign-off.

State the name and account number of the Account that this Checklist supports (i.e. Company, Trust etc)

Account Name:	Biema Holdings Ltd	Root No:	
Name of Individual to whom this Checklist relates:	Berg S. Arndt.	Capacity in which acting: (Beneficial Owner, Settlor, Trustee, Beneficiary, ULA holder etc)	UBO.

Has **THIS INDIVIDUAL** been personally verified 'Face to Face'?

'Face to Face' means any SG member of staff has personally met and verified the individual's identity.

YES

NO

FACE TO FACE VERIFICATION:

Obtain one document verifying Name AND one document verifying Address.

Tick relevant document

Date copy placed on file

First Verify Client's NAME with either of the following two documents:

- Current signed passport (copy pages showing front cover, document number, date and place of issue, expiry date, date and place of birth and signature); ☒
- National Identity Card (showing document number, date and place of issue, expiry date, date and place of birth and signature) ☐

Then Verify Client's Permanent Residential ADDRESS with any ONE of the following:

- Income tax notification for current year (but not if used for 2nd identity verification) ☐
- Utility bill (up to three months old) ☒
- Bank statement (up to three months old) showing permanent residential address. ☐
- Current full driving licence or photocard driving licence (temporary or provisional licences are not acceptable); but not if used for secondary identity verification ☒
- Property tax bill (for the current year) ☐
- Written Record of home visit (meeting clients inside their permanent residence) ☐
- Electoral register search through a credit reference agency ☐

IN ADDITION

IF the Client HAS NOT been personally met by any SG member of staff:

ONE of the following Documents AND ONE of the Checks must be obtained as additional identification to the above.

Documents

- Firearms certificate
- Current full driving licence or photocard driving licence (temporary or provisional licences are not acceptable)
- Tax Notification e.g. income tax or property tax (should show permanent residential address)

Checks - attach a copy of one of the following

- The initial deposit cheque or direct debit drawn on a personal a/c in the applicant's own name at another UK or EU bank or building society.
- The direct mailing of account opening documentation to a named individual at an independently verified address (e.g. 192 search).
- A file note recording the telephone contact with the applicant prior to account opening on an independently verified home or business number. (e.g. 192 search)
- If none of the above are available, refer to MLRO for guidance

Tick relevant document

Date copy placed on file

ALSO

Relationship Manager:	I verified the identity of the above person for Anti-Money Laundering purposes as required by SG Hambros			
	Signature: <i>Phil Chambers</i>	Name: <i>ARB</i>	Position: <i>1/05/07</i>	Date:
MLRO Compliance:	I have checked the World-Check database and confirm that this person does not appear on any Sanction list			
	Signature: <i>L. P. G. G. G.</i>	Name: <i>DMERO</i>	Position: <i>9/8/07</i>	Date:

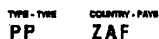
* See also ~~12777~~ *

381950 and 394122

Client Relationship Manager
SG Hambros Bank & Trust (Jersey) Limited

REPUBLIC OF SOUTH AFRICA REPUBLIQUE D'AFRIQUE DU SUD

PASSPORT PASSEPORT



SURNOME - NOM -
BENGIS

ARNOLD MAURICE

SOUTH AFRICAN / SUD-AFRICAIN

M SOUTH AFRICA

DATE OF ISSUE - DATE DE DELIVRANCE

30 12 1998

DATE OF ENTRY - DATE OF DEPARTURE

29 12 2008

AUTHORITY - AUTOREN
DEPT OF HOME AFFAIRS


PPZAFBENGIS<<ARNOLD<MAURICE<<<<<<<<<<<<<<<<
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38-50

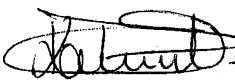
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**CLIENT AML
RISK ASSESSMENT FOR BANKING BUSINESS (STAND ALONE ENTITIES SIMPLE LAYERS ONLY)**

BANKING BUSINESS - CLIENT AML RISK ASSESSMENT							
Name of Account:		Biema Holdings Ltd				Account No:	
Client:		Biema Holdings Ltd Arnold Bengis				DATE: 1-Aug-07	
Risk Area	Weight by AREA	Risk Driver	Answer	Risk			
Client is Automatically High Risk	HIGH RISK - 127	1. Is the Client's identity <u>UNKNOWN</u> to SGH?	No				
		2. Is the Client a Politically Exposed or associated Person (PEP)?	No				
		3. Is the Client Hold All Mail?	No				
		4. If the account is a company, has it issued Bearer shares?	No				
		5. Is the Client a resident of/a national of, or do they have any business interests in a High Risk Country?	No				
		6. Is the Client's wealth derived from any of: Arms trading, casino / gambling, Art / antique dealings, Precious metal dealings, Construction / public works, Import / Export business, Cash transmission business?	No				
Risk Area	Weight by AREA	Risk Driver	Answer	Rating	Risk Weight	Risk Score	Risk
The Client	2	What is the Client's Nationality?	SEYCHELLES S.A.	2	2	4	MEDIUM RISK
	2	In which country does the client live?	LIECHTENSTEIN S.A.	2	2	4	MEDIUM RISK
The Account	2	Nationality of Account? (country of incorporation if a company or trust)	CYPRUS	2	2	4	MEDIUM RISK
Source of Wealth	1	From which activity has the client accumulated their wealth?	Inheritance	1	1	1	LOW RISK
AUM's	1	What is the asset value of the client?	£500k to £5M	2	1	2	MEDIUM RISK
CLIENT RISK				MEDIUM RISK SIGN OFF REQUIRED SEE BELOW			
OLYMPIC INPUT Alternate Numbering Type to be set up				Input Code 128			

CERTIFICATION BY THE PERSON COMPLETING THIS RISK ASSESSMENT		
I confirm that the above Risk Assessment is based on information provided by or on behalf of the Client and I have no reason to doubt its accuracy.		
 Sign in the space above and print your name and job title		1-Aug-07
		Date
THE FOLLOWING ADDITIONAL MANAGEMENT SIGN OFF IS REQUIRED		
		08/08/07
Medium Risk business must be signed off by a Client Relationship Manager		
Client Relationship Manager signature	Print name	Date

Agreed with Tom Francis that this account should be considered as medium - risk.

 7/8/07.

213594 CL1 KYCC 30/4/08 PGS: 1

This document establishes the Identity of an Individual who is party to a Corporate, Trust or other type of account for which a separate full checklist is being completed. This document should accompany the full checklist for sign-off.

State the name and account number of the Account that this Checklist supports (i.e. Company, Trust etc)

Account Name :	Biema Holding Ltd	Root No:	
Name of Individual to whom this Checklist relates:	Mooslethar - Battine, - Angelika	Capacity in which acting: (Beneficial Owner, Settlor, Trustee, Beneficiary, ULA holder etc)	Director.
Has THIS INDIVIDUAL been personally verified 'Face to Face'?			YES <input type="radio"/> NO <input checked="" type="radio"/>
'Face to Face' means any SG member of staff has personally met and verified the individual's identity.			

FACE TO FACE VERIFICATION:

Obtain one document verifying Name AND one document verifying Address.

Tick relevant document Date copy placed on file

First Verify Client's NAME with either of the following two documents:

- Current signed passport (copy pages showing front cover, document number, date and place of issue, expiry date, date and place of birth and signature); ☒
- National Identity Card (showing document number, date and place of issue, expiry date, date and place of birth and signature) ☐

Then Verify Client's Permanent Residential ADDRESS with any ONE of the following:

- Income tax notification for current year (but not if used for 2nd identity verification) ☐
- Utility bill (up to three months old) ☒
- Bank statement (up to three months old) showing permanent residential address. ☐
- Current full driving licence or photocard driving licence (temporary or provisional licences are not acceptable); but not if used for secondary identity verification ☒
- Property tax bill (for the current year) ☐
- Written Record of home visit (meeting clients inside their permanent residence) ☐
- Electoral register search through a credit reference agency ☐

IN ADDITION

IF the Client HAS NOT been personally met by any SG member of staff:

ONE of the following Documents AND ONE of the Checks must be obtained as additional identification to the above.

Tick relevant document Date copy placed on file

Documents

- Firearms certificate ☐
- Current full driving licence or photocard driving licence (temporary or provisional licences are not acceptable) ☒
- Tax Notification e.g. income tax or property tax (should show permanent residential address) ☐

Checks – attach a copy of one of the following

- The initial deposit cheque or direct debit drawn on a personal a/c in the applicant's own name at another UK or EU bank or building society. ☐
- The direct mailing of account opening documentation to a named individual at an independently verified address (e.g. 192 search). ☐
- A file note recording the telephone contact with the applicant prior to account opening on an independently verified home or business number. (e.g. 192 search) ☐
- If none of the above are available, refer to MLRO for guidance

ALSO

Relationship Manager:	I verified the identity of the above person for Anti-Money Laundering purposes as required by SG Hambros		
	<i>P. Chambers</i>	Signature: <i>PAUL CHAMBERS</i>	Name <i>ARB</i> Position <i>01/08/07</i> Date:
MLRO Compliance:	I have checked the World-Check database and confirm that this person does not appear on any Sanction list		
	<i>[Signature]</i>	Signature: <i>LPlewin</i>	Name <i>MLRO</i> Position <i>7/8/7</i> Date:

* See a/c 207330.

ANTI-MONEY LAUNDERING CHECKLIST - UNDERLYING TRUST

FOR INTERNAL USE ONLY

This document establishes the Identity of a Trust that is party to another Corporate, Trust or other type of account for which a separate full checklist is being completed. This document should accompany the full checklist for sign-off.		
State the name and account number of the Account that this Checklist supports (i.e. Company, Trust etc)		
Name :	Biema Holdings Ltd	Root No:
State the full name of the Trust that this Checklist relates to and capacity in which it is acting for the above Account.		
Name of Trust:	The Rosebud settlement	
Full Name(s) of ALL Trustees:	Paperwork from London attached. Warwick Newbury Signed off 04/06/07.	
Capacity:	Beneficial Owner	Other capacity (please state):

Original or certified copies should be obtained of the following documents.

A. Where SGH Trust Co. acts as Trustee; Obtain ALL of the following:	Tick relevant document	Date to file
1. Confirm the original trust deed (and any subsequent deed(s)) are held on file evidencing appointment of SG Hambros Trust Company as current trustees;	<input type="checkbox"/>	_____
2. Resolution of the Trustees to open an account and confer authority to operate it.	<input type="checkbox"/>	_____
3. GIC to confirm that SGHT is aware of the true identity of the underlying principals (the Settlor(s), Protector, Beneficiary(ies) etc.), and that there are no anonymous principals;	<input checked="" type="checkbox"/>	_____
4. If required by local jurisdiction legislation, obtain copies of the identification documentation used by the Introducer to verify the underlying individuals - attach relevant Checklist(s) E, F, G etc and quote names on KYC template overleaf	<input type="checkbox"/>	_____

OR

B. For ALL OTHER TRUSTS: Obtain ALL of the following:	Tick relevant document	Date to file
1. Obtain a copy or extracts of the original trust deed (and any subsequent deed) evidencing the appointment of the current trustees and any other principals	<input type="checkbox"/>	_____
2. If not evident from the Trust Deed, Obtain written confirmation from the Trustees or Managers of the Trust that they are themselves aware of the true identity of the underlying principals i.e. the Settlor(s) and/or named Beneficiary(ies), and that there are no anonymous principals	<input type="checkbox"/>	_____
3. Obtain documents verifying name and address of the following principals: <ul style="list-style-type: none"> The Settlor(s) - Use a separate Checklist E2 for each Individual The Protector (if one exists) - Use a separate Checklist E2 for each Individual ALL Trustees - Use a separate Checklist E2 for each Individual Trustee or use a Checklist F for Corporate Trustees ALL Beneficiaries <u>prior to distributions</u> - Use a separate Checklist E2 for each. 	<input type="checkbox"/>	_____

Please refer to your MLRO should you have any concerns with regards to the above documentation.

* If above documents not obtained, record reasons on a new page

Relationship Manager:	I verified the identity of the Trust for Anti-Money Laundering purposes as required by SG Hambros Group			
MLRO Compliance:	I have checked the World-Check database and confirm that this Trust nor any of its associated individual(s) appear on any Sanction list.			
	Signature: <i>Phil Chambers</i>	Name: <i>APB</i>	Position: <i>1/08/07</i>	Date: _____
	Signature: <i>[Signature]</i>	Name: <i>DMCRO</i>	Position: <i>7/8/7</i>	Date: _____

See a/c 207330.

ΚΥΠΡΙΑΚΗ
REPUBLIC



ΔΗΜΟΚΡΑΤΙΑ
OF CYPRUS

HE 183067

MINISTRY OF COMMERCE, INDUSTRY AND TOURISM
DEPARTMENT OF REGISTRAR OF
COMPANIES AND OFFICIAL RECEIVER
NICOSIA

1 December, 2006

CERTIFICATE

BIEMA HOLDINGS LTD

It is hereby certified that, in accordance with the records kept by this Department
the following are the Shareholders of the above Company :

Names and Addresses

ROSEBUD SETTLEMENT

Aelestrasse, 74
F1-9490 Vaduz, Liechtenstein

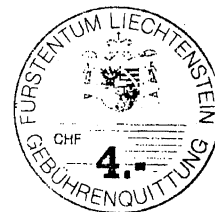
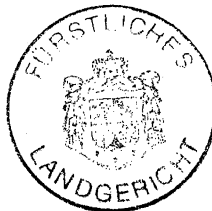
Class (value)

ORDINARY (CYP 1,00)

No. of Shares

1000

for Registrar of Companies



Mit der Urschrift gleichlautend
Fürstliche Landgerichtskanzlei Vaduz
Vaduz, am

Julius Nägele
Urkundsperson

21. Juni 2007